

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

**XIAOJUN WANG,**

Plaintiff,

v.

**JOHN DOE, AND 445.COM,**

Defendants.

Case No. 1:21-cv-00377

**JOINT MOTION TO DSIMISS**

**IN RE: 445. COM.**

Pursuant to Fed. R. Civ. P. 41(a)(2), Counsel for Plaintiff Xiaojun Wang (“Plaintiff”) and Counsel for Defendant Richard Blair (“Defendant”) hereby move for an order dismissing Plaintiffs’ claims in this action against Defendant without prejudice, with each party to bear its own costs, expenses, and attorneys’ fees.

DATED July 19, 2021.

Respectfully submitted,

By: /s/ Steven War  
Steven War (VSB # 45048)

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**ATTORNEYS FOR PLAINTIFF  
XIAOJUN WANG**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on July 19, 2021, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document.

By: *Steven War*  
Steven War